

**UNITED STATES DISTRICT COURT FOR THE  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION**

SOLOMON CHAU, Derivatively on Behalf  
of TESLA, INC.,

Plaintiff,

v.

ELON MUSK, ROBYN DENHOLM,  
KIMBAL MUSK, IRA EHRENPREIS,  
JAMES MURDOCH, LAWRENCE J.  
ELLISON, KATHLEEN WILSON-  
THOMPSON, HIROMICHI MIZUNO,  
ANTONIO J. GRACIAS, STEPHEN T.  
JURVETSON, BRAD W. BUSS, and  
LINDA JOHNSON RICE,

Defendants,

-and-

TESLA, INC., a Delaware Corporation,

Nominal Defendant.

Case No.: 1:22-cv-00592-LY

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[Caption continued on next page]

ALVIN JANKLOW, Derivatively on Behalf  
of TESLA, INC.,

Plaintiff,

v.

ELON MUSK, ROBYN DENHOLM,  
KIMBAL MUSK, IRA EHRENPREIS,  
JAMES MURDOCH, LAWRENCE J.  
ELLISON, KATHLEEN WILSON-  
THOMPSON, HIROMICHI MIZUNO,  
ANTONIO J. GRACIAS, STEPHEN T.  
JURVETSON, BRAD W. BUSS, and  
LINDA JOHNSON RICE,

Defendants,

-and-

TESLA, INC., a Delaware Corporation,

Nominal Defendant.

Case No.: 1:22-cv-00611-LY

**[PROPOSED] ORDER GRANTING**  
**UNOPPOSED MOTION TO CONSOLIDATE RELATED DERIVATIVE**  
**ACTIONS AND APPOINT CO-LEAD COUNSEL**

On this day, the Court considered the Unopposed Motion to Consolidate Related Derivative Actions and Appoint Co-Lead Counsel (the "Motion"). After consideration, the Court hereby GRANTS the Motion:

Accordingly, the Court ORDERS as follows:

1. The following actions are hereby related and consolidated for all purposes, including pre-trial proceedings, trial, and settlement:

<b><u>Abbreviated Case Name</u></b>	<b><u>Case Number</u></b>	<b><u>Date Filed</u></b>
<i>Chau v. Musk, et al.</i>	1:22-cv-00592-LY	06/16/2022
<i>Janklow v. Musk, et al.</i>	1:22-cv-00611-LY	06/22/2022

2. Every pleading filed in the Consolidated Derivative Action, or in any separate action included herein, shall bear the following caption:

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
AUSTIN DIVISION

IN RE TESLA INC. STOCKHOLDER  
DERIVATIVE LITIGATION

Lead Case No. 1:22-cv-00592-LY

(Consolidated with Case No. 1:22-cv-00611-LY)

This Document Relates To:

3. The files of the Consolidated Derivative Action shall be maintained in one file under Master Docket No. 1:22-cv-00592-LY.

4. Co-Lead Counsel for Plaintiffs for the conduct of the Consolidated Derivative Action ("Co-Lead Counsel") are:

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5. Plaintiffs' Co-Lead Counsel shall have the authority to speak for Plaintiffs in matters regarding pre-trial procedure, trial, and settlement negotiations and shall make all work

assignments in such manner as to facilitate the orderly and efficient prosecution of this litigation and to avoid duplicative effort.

6. Plaintiffs' Co-Lead Counsel shall be responsible for coordinating all activities and appearances on behalf of Plaintiffs. No motion, request for discovery, or other pre-trial or trial proceedings shall be initiated or filed by any plaintiff except through Plaintiffs' Co-Lead Counsel.

7. Plaintiffs' Co-Lead Counsel shall be available and responsible for communications to and from this Court, including distributing orders and other directions from the Court to counsel. Plaintiffs' Co-Lead Counsel too shall be responsible for creating and maintaining a master service list of all parties and their respective counsel.

8. Defendants' counsel may rely upon all agreements made with any of Plaintiffs' Co-Lead Counsel, or any other duly authorized representative of Plaintiffs' Co-Lead Counsel, and such agreements shall be binding on Plaintiffs.

9. Unless otherwise altered, this Order shall apply to each derivative case subsequently filed in, removed to, or transferred to this Court arising out of the same or substantially the same transactions or events as the Related Actions.

10. When a case that properly belongs as part of *In re Tesla Inc. Stockholder Derivative Litigation*, Lead Case No. 1:22-cv-00592-LY, is hereafter filed in the Court or transferred here from another court, this Court requests the assistance of counsel in calling to the attention of the clerk of the Court the filing or transfer of any case which might properly be consolidated as part of *In re Tesla Inc. Stockholder Derivative Litigation*, Lead Case No. 1:22-cv-00592-LY, and counsel are to assist in ensuring that counsel in subsequent actions receive notice of this Order.

SO ORDERED, THIS \_\_\_\_\_ DAY OF \_\_\_\_\_, 2022.

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HON. LEE YEAKEL  
UNITED STATES DISTRICT COURT JUDGE